

REMARKS

This paper is responsive to a non-Final Office action dated January 8, 2007. Claims 1-2 were both rejected and are now cancelled. New claims 3-22 are added.

*New Counsel for Applicant*

For convenience of the Examiner, the undersigned respectfully notes the new power of attorney and new correspondence address now of record in the present matter. Appropriate papers were filed 17 May 2007.

*Rejections have been Addressed by Amendments*

Claim 1 was rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 7,124,295 to Zhao et al. (hereinafter *Zhao*). Claim 2 was rejected under 35 U.S.C. § 103(a) as unpatentable over *Zhao* in view of U.S. Publication No. 20030182573 to Toneguzzo (hereinafter *Toneguzzo*). In rejecting over *Zhao*, the Office relies upon “update information only CRLs” disclosed therein as corresponding to applicant’s delta CRLs and seeks to combine *Toneguzzo*’s use of a hash function in its rejection of claim 2.

Applicant has amended to more clearly distinguish over *Zhao* and *Toneguzzo*. While the scope of the new claims is properly expressed in terms of delta CRLs and hashes, the presently claimed subject matter is neither disclosed nor suggested by *Zhao* or *Toneguzzo*, whether taken alone or in combination. More specifically, the new claims now more clearly recite the computation of a hash value that is a function of at least a subsequent CRL state to which a given delta CRL corresponds. Unlike a simple hash of a delta coding itself, a hash on the resultant state or (as in some embodiments) on both a prior and a resultant state is not vulnerable to certain failure modes such as out of order update or update application to an inappropriate base state. Thus, even leaving aside whether or not *Zhao*’s multiple-update-spanning deltas correspond Applicant’s delta CRLs, *Toneguzzo*’s use of a hash is inapposite. In particular, *Toneguzzo*’s hash-including digital signature is computed over the data unit itself that is secured for transmission. In contrast, Applicant’s claims recite a hash computed not over a delta CRL itself, but rather over a subsequent CRL state that would result from proper application of the delta

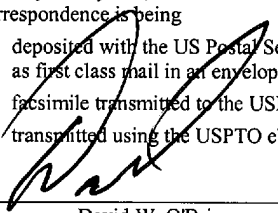
CRL to a proper base state. *Toneguzzo* simply does not disclose or suggest a hash generated based on a resultant state.

While *Toneguzzo*'s hash is used to validate integrity of a transmission, it does not validate proper application of a delta CRL to a proper base CRL to produce the expected resultant CRL. Because of disclosure of a hash that is a function of at least resultant CRL state is entirely absent from either reference, no *prima facie* case of obviousness is supportable based on *Zhao* and *Toneguzzo*.

Furthermore, the particular combination of teachings proposed by the Office would not have been obvious to a person of skill in art since *Toneguzzo*'s use of a hash-based digital signature would be entirely duplicative of *Zhao*'s own use of a digitally signed delta CRL. Specifically, a person of skill in the art would not have been motivated to draw from *Toneguzzo* a feature already provided for in *Zhao*. In short, even leaving aside the absence of disclosure for a hash of the particular type recited (i.e., hash on a *resultant* state), the Office's theory of obviousness necessarily and impermissibly relies on a combination motivated by applicant's own claims and disclosure rather than any teaching, suggestion or motivation contained in the references themselves or more generally in the art. For at least the preceding reasons, claims 3-22 are all allowable and a notice to that effect is respectfully requested.

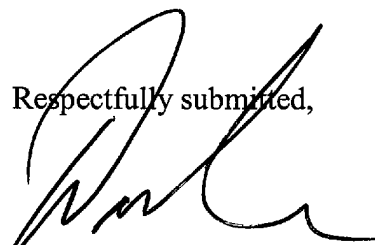
#### Conclusion

In summary, claims 1 and 2 have been cancelled. New claims 3-22 have been added and believed to be allowable over the art of record. Nonetheless, if any issues remain that could be more efficiently handled by telephone, the Examiner is requested to call the undersigned at the number listed below.

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	<u>9-July-07</u>
David W. O'Brien	Date

<b>EXPRESS MAIL LABEL:</b> _____
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Respectfully submitted,

  
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